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Presentment Date: March 1, 2020, 12:00 p.m.
Objection Deadline: February 26, 2020 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,

v.

KUNTZMAN FAMILY LLC; JACQUELINE D.
GREEN, in her capacity as a Managing Member of
the Kuntzman Family L.L.C. and as Trustee of the

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04752 (SMB)

Irrevocable Trust FBO Jennifer Gattegno and the Irrevocable Trust FBO Ethan Siegel, both members of the Kuntzman Family L.L.C, WAYNE D. GREEN, in his capacity as a Managing Member of the Kuntzman Family L.L.C.; JUDITH GATTEGNO, in her capacity as a Member of the Kuntzman Family L.L.C.; IRREVOCABLE TRUST FBO JENNIFER GATTEGNO, in its capacity as a Member of the Kuntzman Family LLC; AND IRREVOCABLE TRUST FBO ETHAN SIEGEL, in its capacity as a Member of the Kuntzman Family L.L.C.,

Defendant.

NOTICE OF PRESENTMENT OF ORDER STRIKING DEFENDANTS' ANSWER AND SEEKING ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANTS

PLEASE TAKE NOTICE that pursuant to this Court's December 22, 2020 Order granting Chaitman LLP's Application to Withdraw as Counsel [ECF No. 107], in accordance with Federal Rules of Civil Procedure 54 and 55(b)(2), Federal Rules of Bankruptcy Procedure 7054 and 7055-2, and Local Civil Rules 55.1 and 55.2, and consistent with this Court's direction at the conclusion of the hearing on this matter on December 16, 2020, the undersigned will present the attached proposed order striking Defendants' Answer and for Entry of Default Judgment to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature in his chambers located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **March 1, 2021 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE that to the extent there is a counter-proposed order or objection to the proposed order, it must be in writing and filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 by no later than February 26, 2021 at 5:00 p.m. (the "Objection Deadline"), with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein; and served upon

(a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York, 10111, Attn: David J. Sheehan, Esq., and (b) Securities Investor Protection Corporation, 1667 K. St. N.W., Suite 1000, Washington D.C. 20006-1620, Attn: Kevin H. Bell, Esq. Any objection to the proposed order must specifically state the interest the objecting party has in these proceedings and the specific basis of any objection. Unless a counter-proposed order or written objection to the proposed order is received before the objection deadline, the proposed order may be signed and entered by the Court without further notice.

New York, New York
February 22, 2021

Of Counsel:

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Trustee for the Substantively
Consolidated SIPA Liquidation of
Bernard L. Madoff Investment
Securities LLC and for the Estate of
Bernard L. Madoff*